

**Fwd: Inform / Google MDL**

John Herman <jherman@hermanjones.com>

Wed 3/8/2023 5:14 PM

To: jsessions@wsgr.con <jsessions@wsgr.con>;eric.mahr@freshfields.com  
<eric.mahr@freshfields.com>

Cc: Serina Vash <svash@hermanjones.com>

I sent this email last week to John Schmidtlein but have not yet received a response. Can you please let us know?

Begin forwarded message:

**From:** John Herman <jherman@hermanjones.com>  
**Date:** March 3, 2023 at 2:58:00 PM EST  
**To:** "Schmidtlein, John" <JSchmidtlein@wc.com>  
**Subject: Inform / Google MDL**

John –

One housekeeping issue we wanted to raise. Rather than forcing Google to reproduce to Inform its prior productions in the MDL, can we reach an understanding that we –as Inform’s counsel – can access those same productions as we have for our other clients, subject to the terms of the Protective Order? If you think we need to add Inform as a signatory to the PO just let us know.

Many thanks.

John C. Herman  
Herman Jones LLP  
3424 Peachtree Road NE  
Suite 1650  
Atlanta, Georgia 30326  
404-504-6555 (office)  
404-326-6343 (mobile)  
jherman@hermanjones.com  
www.hermanjones.com